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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company
To Revise Its Electric Marginal Costs, Revenue
Allocation and Rate Design

(U-39 M)

A.06-03-005

(filed March 2, 2006)

**COMMENTS OF
THE ENERGY PRODUCERS AND USERS COALITION**

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February 28, 2008

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The Energy Producers and Users Coalition (EPUC)¹ submit these comments pursuant to the Assigned Commissioner's Ruling (ACR), as modified by the Administrative Law Judge's (ALJ) February 6, 2008 ruling on schedule. These comments make two primary points, and respond to specific questions in the ACR.

- ▶ First, delay in the implementation of the California Independent System Operator's (CAISO) Market Redesign and Technology Upgrade (MRTU) day ahead market must result in a corresponding delay in the timetable for Real Time Pricing (RTP) tariffs.
- ▶ Second, care must be taken to ensure rates are designed to reflect the costs of service; any over- or under-collection resulting from a particular rate should accrue to or be the responsibility of the customers on that rate.

I. Introduction

The California Public Utilities Commission (Commission) intends to answer the following three questions in its Dynamic Pricing Strategic Workplan.

- 1) *What types of dynamic pricing tariffs should PG&E offer to its customers?*

¹ EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, BP West Coast Products LLC, Chevron U.S.A. Inc., ConocoPhillips Company, ExxonMobil Power and Gas Services Inc., Shell Oil Products US, THUMS Long Beach Company, Occidental Elk Hills, Inc., and Valero Refining Company – California.

- 2) *When should PG&E offer each type of dynamic pricing tariffs to each customer class?*
- 3) *How should the dynamic pricing tariffs be designed and integrated into PG&E's overall rate design?*

Critical Peak Pricing (CPP) and Real Time Pricing (RTP) dynamic pricing tariffs should be offered as options to large commercial and industrial customers, in addition to the existing time of use tariffs. As described below, the timing of the development of the dynamic pricing tariffs, particularly RTP, depends entirely on the timing of MRTU implementation. Rate design questions and integration of dynamic pricing into PG&E's overall rate design can be responded to more substantively upon submission of actual rate design proposals for consideration. EPUC anticipates continued active participation in the development of the Commission's Strategic Workplan on Dynamic Pricing. In the meantime, EPUC provides the following comments.

II. The Draft Timetable Must Be Amended To Include a Delay In RTP Commensurate with the Delay in MRTU Implementation.

The ACR states that “*a delay beyond the summer could require a delay in the implementation in RTP.*” ACR, at 4 (emphasis added). This Commission, the utilities, and customers must have at least the time proposed in the ACR to acclimate to the MRTU day-ahead market. As PG&E, CMTA and EPUC have noted in past comments, day-ahead prices should be monitored for at least 18 months before they are used in dynamic pricing. The ACR's proposed timetable provides for “*9 months of experience with the market before proposing the new RTP rate and 21 months with the new market before the rate becomes available to customers.*” ACR, at 3. With MRTU likely delayed past this summer, the

proposed implementation timetable for RTP must also be delayed.

III. Dynamic Pricing Rates Must Be Carefully Designed To Ensure Customers Pay Cost of Service Rates and Over/Under-Collections Must Remain Segregated.

Rate design should ensure that any over- and under-collections accrue to or be collected from the customers on the associated rate. As the ACR notes, *“If it is less expensive to serve the customers on a given dynamic pricing rate, then the rate should reflect that lower cost to serve.”* ACR, at 8. The corollary is that if it ends up being more expensive, the rate should also reflect the higher cost to serve those customers. Accordingly, customers opting to remain on general, time-of-use tariffs should pay their cost-of-service, and not be penalized for not switching to a dynamic pricing tariff by having to pay any under-collection that may result from dynamic pricing.

IV. Responses to Specific Questions in the ACR

What rate should be the default rate for large commercial and industrial customers in 2010: CPP or RTP?

Given the delay in MRTU and the need for a corresponding delay in RTP development, CPP should be the default rate in 2010 for large commercial and industrial customers, with the ability to opt out to time of use tariffs.

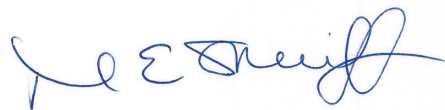
The ACR provides that customers will be able to opt out to the time-of-use tariff after one year on a dynamic pricing rate during which bill protection would be in place. Both the bill protection during the required one year on the dynamic pricing and the ability to switch back to the time-of-use tariff are critical to large commercial and industrial customers. These provisions must remain in the Commission’s Strategic Workplan to implement dynamic pricing.

V. Conclusion

The timetable for RTP development and implementation must be amended to reflect the current delay in MRTU implementation. The utilities should comply with the general rate design guidance provided in the ACR and attachment A, particularly the provision that rates should reflect costs to serve and promote economically efficient decision-making. Additional comments will be provided after PG&E files a straw CPP rate and at the CPP straw rate workshop.

February 28, 2008

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'E. Kahl', with a stylized flourish at the end.

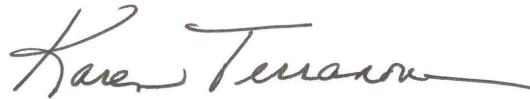
Evelyn Kahl
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CERTIFICATE OF SERVICE

I, Karen Terranova hereby certify that I have on this date caused the attached **Comments of the Energy Producers and Users Coalition** in A.06-03-005 to be served to all known parties by either United States mail or electronic mail, to each party named in the official attached service list obtained from the Commission's website, attached hereto, and pursuant to the Commission's Rules of Practice and Procedure.

Dated February 28, 2008 at San Francisco, California.

A handwritten signature in cursive script, reading "Karen Terranova". The signature is written in dark ink and is positioned above the printed name.

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